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REMARKS

In the office action mailed December 28, 2006, the Examiner rejected claims 14 through 20 under 35 USC Section 112 as being incomplete for omitting essential steps. In particular, the Examiner states that "there is no recitation in the claim as to which device generates the unique identifier" and "there is no indication how the unique identifier is generated". The Examiner's rejection is respectfully traversed. There is no legal requirement that the claim recite how the identifier is generated to be complete. Applicants can claim the invention as broadly as permitted by the prior art. The claim recites that the unique identifier is generated and transmitted, and this is sufficient to satisfy the requirements of 35 USC Section 112, second paragraph.

The Examiner rejected claims 1-3 and 5 under 35 USC Section 102(e) as being anticipated by Johnston. Claims 6-13 and 21-23 were rejected under 35 USC Section 102(e) as being anticipated by Lindemann. Claims 14-18 were rejected under 35 USC section 102(e) as being anticipated by Hind. Claim 4 was rejected under 35 USC Section 103 (a) as being unpatentable over Johnston in view of Mann. Claims 19 and 20 were rejected under 35 USC Section 103 as being unpatentable over Hind in view of Mann. Claim 24 was rejected under 35 USC Section 103 as being unpatentable over Lindemann in view of Mann. Reconsideration of the claims in view of the following remarks is respectfully requested.

Claim 1 recites:

a controller storing SIM information received from a mobile device via the local link receiver, the controller using the stored SIM information to effect secure communications with the mobile device.

Johnston discloses a cellular link. As described in Applicants' specification, a cellular link is not a local link. Accordingly, Johnston can not anticipate the claimed invention.

Claim 2 recites:

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wide area transceiver for communicating with a cellular system, the controller using the SIM information received from the mobile device to authenticate and register the client device on a wide area network.

Claim 2 thus recites a local link receiver and a cellular system transceiver. Johnston is completely devoid of the local link receiver, and clearly fails to disclose a local link receiver to receive SIM information which information is used to register on the cellular system. Accordingly, Johnston can not anticipate the claimed invention.

Claim 6 recites:

- a SIM client within the client device;
- a first authentication application unit...; and
- a SIM client positioned within the server device including an authentication and ciphering unit, generating a user unit code and transmitting the generated user unit code to the client device over the packet data network in response to the first synchronization command wherein the generated user unit code is stored by the client device and by the server device and the authentication and ciphering unit transmits a message to the client device over the packet data network, the message including a control command and the user unit code stored in the server device, and wherein the first authentication application unit compares the user unit code received in the message with the user unit code stored in the client device and executes the control command in response to the user unit code stored in the client device being the same as the user unit code received in the message, and wherein the authentication and ciphering unit establishes an authenticated connection prior to the provision of information services to the client device.

The examiner indicates that the claim limitations can be found in column 13, line 23 through column 14, line 7, of Lindemann. However, this section of the patent fails to disclose the system having two SIM clients and the authentication unit with the claimed relationship including a control command,

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authentication and that executes the control command. The Examiner is respectfully requested to specifically point out the two SIM clients and the authentication application unit with the claimed operability. Lindemann fails to disclose the claimed invention, and can not anticipate the claims.

Claim 14 recites, *inter alia*:

transmitting a control command including the identifier stored at the server device over the packet data network from the server device to the client device; and

determining at the client device whether the transmitted identifier is the same as the identifier stored at the client device and executing the control command in response to the transmitted identifier being the same as the identifier stored at the client device.

The Examiner indicates that Hind discloses the claimed limitations at column 18, line 47, to column 19, line 63. However, Hind fails to disclose transmitting a control command... over the packet data network ... and executing the control command at the client device in response to the transmitted identifier being the same.... Accordingly, Hind can not anticipate the claimed invention. The examiner is respectfully requested to point out the "control command" that is transmitted and where Hind discloses "executing the command in response to the transmitted identifier being the same."

Claim 21 recites:

a SIM client;
a local link transmitter;
a local link receiver; and
a controller storing SIM information received from a second mobile device via the local link receiver, the controller using the stored SIM information to effect secure communications with the second mobile device.

Lindeman fails to disclose a system which receives SIM information via a local link. As described in Applicants' specification, the cellular link is not a local link. Accordingly, Lindemann can not anticipate the claimed invention.

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The secondary reference to Mann fails to disclose the structure missing from Johnston, Lindemann and Hind, and thus even if combined as suggested only by the Examiner, the combinations fail to disclose the basic structure of applicants' invention, and can not render the claims unpatentable.

Accordingly, it is respectfully submitted that the claims are in condition for allowance, and a Notice of Allowance is solicited.

Respectfully Submitted

Pecen, Mark E, et al.

BY: 

Randall S. Vaas Date 6-28-2006

Registration No. 34,479

Phone (847) 523-2327

Fax. No. (847) 523-2350